

[illegible]

BellSouth FACILITIES PROBLEMS

October 1997

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer M	Site 5	08/04/97	08/04/97	0	10/15/97	10/16/97	o BellSouth technician reported he was unable to gain access to the Customer's facility. He did not have the combination. The customer gave the combination to the BellSouth dispatcher, who neglected to give the information to the technician.
							o The migration was completed on 10/16/97.
							(One day late)
Customer N		10/14/97	10/16/97	2	10/20/97	10/22/97	o On 10/15/97 the due date was changed to 10/20/97 because the customer requested additional lines.
							o On 10/20/97 BellSouth's engineering was not complete and the due date was changed to 10/22/97. The migration was completed on 10/22/97
							(Two days late)
Customer M	2E002G	09/17/97	09/17/97	0	10/15/97	10/31/97	o BellSouth Construction Delays
Customer M	2E073A	09/17/97	09/17/97	0	10/10/97	10/31/97	o BellSouth Construction Delays

BellSouth FACILITIES PROBLEMS

October 1997

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

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[illegible]

October FOC Problems

BellSouth FOC Problems
October 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Total ASRs Submitted: 21
Total FOCs Received Within 48 Hours: 19
Percent of FOCs Received Within 48 Hours: 90%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer P	N47617197/C33626197	10/6/97	10/9/97	3	10/15/97
Customer Q	Rolfedso.vw	10/27/97	10/30/97	3	10/31/97

November FOC Problems

BellSouth FOC Problems
November 1997

FOC PROBLEMS (OVER 48 HOURS)

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Total ASRs Submitted: 19

Total FOCs Received Within 48 Hours: 16

Percent of FOCs Received Within 48 Hours: 84%

CUSTOMER	Customer PON	ASR TO BELL	FOC Received	Number of Business Days From ASR To FOC	Actual Migration Complete
Customer R	Citrus.bri	10/6/97	10/16/97	10	11/04/97
Customer S	TWC.ds3	10/14/97	10/25/97	11	11/05/97
Customer M	2E018E	11/6/97	11/11/97	6	11/12/97

EXHIBIT F



BellSouth Interconnection Services
Two Chase Corporate Drive, Suite 440
Birmingham, Alabama 35244

May 2, 1997

Melissa Closz
Director Local Market Deveioption
Sprint
151 Southhall Lane, Suite 400B
Maitland, FL 32751

Dear Melissa,

I would like to provide a status on an issue identified in your letter of April 18 regarding DACS mapped Integrated SLC. This issue has been escalated and appropriate resources assigned to study the issue. This is a non-standard procedure that involves manually provisioning circuits without a service order.

We do not want to use this method until we are convinced that we understand all of the impacts to your end user customer. We will continue to look at this issue to resolve these concerns and will update you as soon as possible.

A handwritten signature in cursive script that reads "Carol".

EXHIBIT G



BellSouth Interconnection Services Fax 205 988-1688
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

May 23, 1997

Ms. Melissa Closz
Director - Local Market Development
Sprint Metropolitan Networks, Inc.
151 Southhall Lane Suite 400B
Maitland, FL 32751

Dear Melissa:

Thank you for your letter dated May 19, expressing concerns with regard to provisioning unbundled loop service via DACS-mapped IDLC.

As a point of clarification, the State of Florida has the largest concentration of DACS facilities in our service region. BellSouth has therefore been keenly aware of the impacts of this service in serving our CLEC customers, and in particular, Sprint Metro.

BellSouth intends to use a two-step procedure for meeting service requirements where facilities have been depleted. The first step will involve using "side door porting" and/or "hairpins" as a procedure to meet your service requirements. Essentially "side door porting" is the same procedure as cutting over a circuit from a DACS. We are developing new procedures to improve coordination between the various network departments that are involved in this complex procedure. We expect these new procedures to be in place by June 21, 1997. We have notified our internal departments of these changes. Prior to the availability of the new procedures, we will work to process any new or existing orders where such provisioning is involved.

The second step occurs after we have added new facilities where there were previously none. BellSouth may, at its discretion, convert the customer to the new facilities, thus requiring a second cutover for customers provisioned through the "side door porting" arrangement. We would like for you and to be aware of this possibility and to advise your end user customers as well.

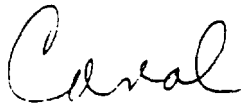
Ms. Melissa Closz

Page 2

May 23, 1997

We believe that this solution will resolve your concerns on provisioning circuits through DACS facilities. If you have additional questions or concerns, please let me know so that we can address them fully.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol".

cc: George Head
Richard Warner
Joe Baker

EXHIBIT H



George V. Head
Vice President
Local Market Integration
7301 College Blvd.
Overland Park KS 66210
KSOPKV0104
Phone: 913-534-6102
Fax: 913-534-6237

June 18, 1997

Mr. Joseph M. Baker
Vice President - Sales
BellSouth Telecommunications, Inc.
Interconnection Services
675 West Peachtree Street, N. E.
Suite 443
Atlanta, Georgia 30375

Dear Joe:

I am writing to again express serious concern regarding recent service problems in Orlando, Florida, and to request BellSouth's review and analysis of the situation in our meeting in Birmingham on June 24th. As you know, our teams have met many times to discuss service related difficulties being encountered by Sprint Metropolitan Networks, Inc. (SMNI), and yet they continue to occur.

During a three week period from May 19 to June 6, 1997, SMNI's customers encountered three significant service interruptions related to receiving calls through the BellSouth network. In each case, Sprint's customers could receive calls directly to their Sprint numbers but calls being call-forwarded through the BellSouth network could not be completed.

In the first occurrence, an "all circuits busy" condition was created on Monday morning, May 19, when interoffice traffic was reversed in error by Bell South in conjunction with trunk additions BellSouth was installing. Customers were impacted for 3 hours and over 20 trouble tickets were received.

The second incident, on May 30, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.

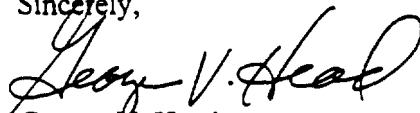
Most recently, on June 6, a simulated facilities group was removed from translations in error by BellSouth, again resulting in calls to SMNI customers being blocked for over two hours.

Attached for your review are the outage reports provided to Sprint by your account team after the first and third event. Each describes "human error" occurring in the translations support team. The second event, for which Sprint did not request a written report, occurred on May 31, 1997 and was also attributed to a translations error.

These errors by BellSouth have resulted in service deficiencies that have damaged Sprint's relationships with its end user customers and are impeding Sprint's ability to establish itself as a local service competitor in Central Florida. Even more disturbing is that these events occurred during a timeframe within which Sprint had requested, and BellSouth had agreed, to provide measurable and specific improvements in the service it provides to SMNI.

I look forward to seeing you and the BellSouth team on the 24th in Birmingham. I trust that BellSouth will have identified the irreversible corrective action on its translations process.

Sincerely,



George V. Head

cc: Melissa Closz - Sprint
Carol Jarman - Bell South

EXHIBIT I



Melissa Cloz
Director, Local Market Development

Local Market Integration
BellSouth Corporation
Metropolitan, IL 60673
Voice 407-875-1142
Fax 407-875-0056
E-Mail: melissa.cloz@bellsouth.net

May 19, 1997

Ms. Carol Jarman
Director- Sprint Account Team
BellSouth Interconnection Services
Suite 440
Two Chase Corporate Drive
Birmingham, AL 35244

Dear Carol:

Thank you for your May 2 letter following up on the status of the "DACS-mapped integrated SLC" provisioning issue which has delayed the installation of several Sprint Metropolitan Networks (SMNI) customer orders. My response is for the purpose of providing clarification as to what the issue is and why its resolution is critical.

SMNI has placed unbundled loop service orders with BellSouth for several customers where the customer is currently provisioned by BellSouth utilizing a DACS-mapped integrated SLC— essentially a "pair gain" device employed by BellSouth to maximize facility utilization. In attempting to provision unbundled loops for SMNI, BellSouth discovered that its systems and procedures did not support re-use of the existing facilities. Further, BellSouth did not have additional facilities available to turn up the unbundled loops ordered by SMNI. BellSouth then chose not to construct additional facilities in lieu of resolving the underlying systems and procedural issues in order to turn up the unbundled loops for SMNI. The result is that of the three service orders referenced in my 4/18 letter, two SMNI service installations were significantly delayed. The third installation was completed without the use of the SLC.

We have been advised by BellSouth personnel that these installations were completed for testing purposes only and that no additional installations of this type will be completed until BellSouth's procedural issues have been resolved. Moreover, we have been told that DACS-mapped integrated SLC provisioning configurations are widely-deployed throughout BellSouth meaning that SMNI will likely continue to encounter customers whose provisioning raises the same issues.

Sprint appreciates BellSouth's desire to seek long term systems and process solutions for provisioning these services. However, our request is that future unbundled loop orders under this provisioning scenario be installed utilizing whatever interim procedures are necessary to complete the service order installations within mutually established intervals. This will enable BellSouth and Sprint to make progress toward our mutual goal of on-time service installations.

Carol, we would appreciate BellSouth's response to the request outlined above by Friday, May 30. Thanks again for your update, and I look forward to your response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa", written in black ink.

Melissa L. Closz

Director - Local Market Development

cc: George Head- Sprint
Richard Warner- Sprint
Joe Baker- BellSouth

**BellSouth Interconnection Services****Memorandum**

Date May 21, 1997

To Linda McGrue
Jerry Johnson

From Gretchen Wilson

Telephone Number 205 988-1879

Fax Number 205 988-7003

Subject Sprint Metro Net routing problems

Linda:

Per your request, following are details relative to the traffic overflow problem in Orlando -

The problem occurred during the provisioning of the new IT groups. The routing in the Colonial Main and Tandem office was reversed on the turn up of the new group. The traffic was rerouted through the tandem and most of the overflows cleared. We had several conversations with Steve (Sprint Metro Net) to verify he was seeing the traffic. He indicated that he was still seeing some overflows. The ACAC verified all of Sprint Metro Net's NNXs in the nine offices where we established direct trunk groups. We found overflow routing problems in 4 offices. The ACAC obtained copies of the routing requests and proceeded to get the traffic rerouted, one office at a time, to insure that we did not cause Sprint Metro Net any additional problems.

To keep this same problem from reoccurring a copy of the routing request will be sent to the project manager to be included in the package for switched access. A copy of this same routing request will be provided to the switched access supervisor to be retained for the maintenance group. Switched access will verify the routing upon turn-up of any new IT group.



BellSouth Interconnection Services Fax 205 988-1688
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

June 12, 1997

Melissa Closz
Director
Local Market Development
Sprint
151 Southhall Lane #400B
Maitland, Florida 32571

Subject: Sprint Metro Outage In Orlando Magnolia 1AESS

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia 1AESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPY5) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93T5D1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia 1AESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
 - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
 - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the 1AESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoral of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker
Richard Warner



BellSouth Telecommunications, Inc. 404 827-7140
Suite 4423 Fax 404 523-0346
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Joseph M. Baker
Vice President - Sales
Interconnection Services

July 1, 1997

Mr. John Cascio
Vice President
Sprint
555 Lake Border Drive
Apopka, Florida 32703

Dear John:

On behalf of BellSouth, I would like to apologize for the recent service interruption experienced by Sprint and its local exchange customers. We value our relationship with Sprint as one of BellSouth's largest wholesale customers, and it is always our intention to provide you with service that meets your standard for customer satisfaction.

This service interruption, which occurred at 5:21pm EDT on June 24, 1997 in BellSouth's Magnolia Central Office, was caused by a work error in our RCMAG (Recent Change Memory Assignment Group), the group responsible for handling translation software. As you know, BellSouth has put into place action plans to help prevent the error from happening again. These plans include short term measures such as the requirement for supervisory approval in these situations. We are also investigating with our vendors long term measures that include enhancing the software involved. Additionally, we have made changes to our methods and procedures to reduce the likelihood of these outages.

Again, BellSouth regrets any inconvenience this service interruption caused Sprint and its customers. We are committed to work cooperatively with Sprint throughout the nine state region to provide the level of service expected by you and your customers.

Yours truly,



J. M. Baker

Copy: George Head, Vice President - National Market Integration, Sprint
Carol Jarman, Sales Assistant Vice President - Sprint, BST
Krista Tillman, Vice President - Operations, BST



BellSouth Interconnection Services Fax 205 988-1688
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

July 8, 1997

Ms. Melissa Cloz
Director - Local Market Development
Sprint
151 Southhall Lane Suite 400B
Maitland, FL 32751

Dear Melissa:

I would like to follow up and provide you with a more detailed description of the events that led to the outage in the Magnolia office on June 24. The situation originated when Magna Computer called BellSouth's Small Business Services Center on June 20 to convert their service from SMNI back to BellSouth. A BellSouth representative in that office issued a disconnect (D) and new (N) order to initiate that process.

Due to that disconnect order, the office equipment for Magna Computer's telephone number was reassigned to another customer when a subsequent order flowed through our systems. When that order was processed, the service for Magna Computer as well as the entire Simulated Facility Group (SFG) was manually deleted from the switch in error. This prevented all of the customers that utilized Service Provider Number Portability (SPNP) in the Orlando Magnolia 1AESS Central Office from receiving incoming calls.

The duration of the outage was approximately 2.5 hours, and our time to repair after the trouble was reported to the UNE center was approximately one hour. The SFG was reprogrammed and the service re-established at 7:40 P.M.

Ms. Melissa Closz

Page 2

July 7, 1997

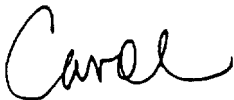
The following guidelines have been implemented to prevent future removal of SFGs in error:

1. Small Business Specialists have been retrained on the proper guidelines to use when issuing future orders.
2. On June 25, 1997, all employees in our Recent Change Memory Administration Group (RCMAG) were re-covered regarding the issues that encompass SFG usage for CLEC services in 1AESS offices.
3. Effective immediately, all SFG removals must require written approval from a translations supervisor. Additionally, our staff is currently working with Lucent Technologies to provide a permanent solution which will prevent SFG removal without complex translations involvement and we will status you on that as soon as possible.

In addition to these measures, plans are also underway to reserve SFG numbers 1 through 9 exclusively for the CLEC community. We will notify you in advance of our plans to migrate SMNI to a specific SFG and will again cover our employees regarding our policy not to disconnect that range of SFGs in general and SMNI's in particular.

Let me reiterate that BellSouth regrets any inconvenience this service interruption caused. Further, we are working diligently to identify and implement corrective actions that involve not only our translations processes, but all service issues that ultimately affect Sprint and its end users customers as well.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol".

80000 SERIES
10% P.C.W.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of Sprint Communications)
Company Limited Partnership, d/b/a)
Sprint, and Sprint Metropolitan Networks,)
Inc., Against BellSouth Telecommunica-)
tions, Inc.)

Orders ☐
DOCS ☐ NO.P.
Corr. ☐
Plead. ☐
Dis. ☐ Filed: October 10, 1997
Test. ☐
Brief ☐
Other ☐

DATE RECEIVED

RECEIVED

OCT 13 '97

OCT 10 1997

COMPLAINT

FPSC - Records/Reporting

Come now Sprint Communications Company Limited Partnership ("Sprint") and Sprint Metropolitan Networks, Inc. ("SMNT")¹, (collectively "Sprint/SMNT" or "Complainants"), pursuant to Rule 25-22.036, Florida Administrative Code, and hereby file this Complaint against BellSouth Telecommunications, Inc. ("BellSouth").

The Parties

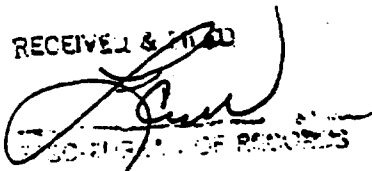
1. Sprint, a Delaware limited partnership, is authorized by the Florida Public Service Commission ("Commission") to provide alternative local exchange and interexchange telecommunications services in the State of Florida. Sprint's business address is:

Sprint Communications Company Limited Partnership
3100 Cumberland Circle - Mailstop GAATLN0802
Atlanta, Georgia 30339

2. SMNT is a Florida corporation authorized by the Commission to provide alternative local exchange telecommunications service in the State of Florida. SMNT's business address is:

Sprint Metropolitan Networks, Inc.
151 Southhall Lane, Suite 400
Maitland, Florida 32751

RECEIVED & FILED


SECRETARY OF RECORDS

¹ By letter dated September 30, 1997, SMNT and Sprint requested that the Florida Public Service Commission approve the transfer of SMNT's ALEC certificate No. 4390 to Sprint. See Exhibit "S" attached to this Complaint.

3. BellSouth is a Georgia corporation authorized by the Commission to provide local exchange and intraLATA interexchange service in the State of Florida.

BellSouth's business address is:

BellSouth Telecommunications, Inc.
150 South Monroe Street, Room 400
Tallahassee, Florida 32301

Introduction

4. As an early provider of competitive local exchange service in Florida, SMNI was one of the first competitors to request unbundled loops from BellSouth. SMNI began ordering and provisioning unbundled loops from BellSouth in May 1996 and, since that time, has experienced numerous delays in provisioning that continue to this date, 17 months later. In addition, BellSouth has been responsible for a number of service interruptions to SMNI customers prior to scheduled cutovers from BellSouth service to SMNI service. BellSouth technicians also have had numerous problems in implementing the remote call forwarding necessary to allow new SMNI customers to retain their "old" BellSouth telephone numbers. BellSouth's failure to properly provision local number portability has resulted in incoming callers to SMNI customers either receiving a disconnect message or experiencing endless ringing. This problem critically impacts business customers who rely on telephone service to conduct their daily business activities. BellSouth's continuing failure to provision unbundled loops and to implement remote call forwarding in an accurate and timely manner without service interruptions jeopardizes the ability of SMNI to attract and retain customers.

5. This matter has received attention at the highest management levels of both companies. Nonetheless, despite the executive attention devoted to these matters, SMNI continues to experience problems that impair its ability to enter the local exchange market in Florida on a broader scale because of the resulting increased customer acquisition costs and negative impact on the Sprint brand name. Therefore, Sprint and SMNI file this complaint and allege as follows: